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January 24, 2014

**BY ECF AND HAND DELIVERY**

The Honorable William H. Pauley, III  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: *Pennsylvania Public School Employees' Retirement  
System v. Bank of America Corp. et al.,  
11-CV-733-WHP (SDNY)*

Dear Judge Pauley:

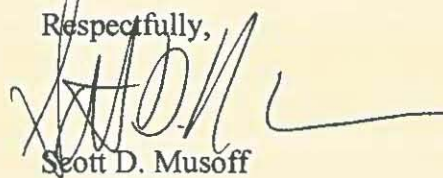
On behalf of Defendant Bank of America Corporation ("BAC"), we respectfully write pursuant to Rule I.D of this Court's Individual Rules of Practice to seek a brief extension of the deadline for substantial completion of the document discovery to February 28, 2014, from January 31, 2014. Plaintiff Pennsylvania Public School Employees' Retirement System ("PSERS") consents to the relief sought here.

The parties recently resolved a good-faith dispute about the appropriate date range for the review and production of electronically stored information ("ESI") that will require BAC to review nearly 200,000 additional documents. Over the course of several months, counsel for BAC and PSERS met and conferred in good faith a number of times to reach accommodation on the scope of the ESI review and production in this case. The parties resolved many issues between them without seeking the Court's intervention. Recently, these discussions resolved the remaining impasse on the scope of the ESI review and production in this case. The agreed-upon date range requires BAC to review a significant volume of documents that it had not anticipated having to review before the existing deadline for substantial completion of document production. Based on the volume of documents, the available resources, and the relevant logistics necessary to complete a review and production

of this magnitude, we respectfully submit that a brief extension of the deadline for substantial completion is required. (This is the second request for an extension of the discovery deadline that that parties have requested. The prior request was granted.) At this time, we do not anticipate seeking any further extension of the document discovery period.

Accordingly, we respectfully requests that the Court extend the deadline for substantial completion of the parties' document discovery to February 28, 2014.

Respectfully,

A handwritten signature in black ink, appearing to read "Scott D. Musoff", with a long horizontal flourish extending to the right.

Scott D. Musoff

cc: Counsel for Individual Defendants (by email)  
Counsel for Plaintiff (by email)